



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 12, 2022

VIA CM/ECF

The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Alexei Saab*, 19 Cr. 676 (PGG)

Dear Judge Gardephe:

The Government respectfully writes to update the Court on (1) the defendant's access to counsel and materials provided by the Government in advance of trial and (2) the Government's understanding as to potentially available trial dates in the first quarter of 2022.

First, the Government has conferred with the Metropolitan Detention Center ("MDC") about the defendant's access to counsel and to the Jencks Act materials provided by the Government last week. MDC has confirmed that (1) defense counsel can request video teleconferences with the defendant on a daily basis, Monday through Friday, and MDC will prioritize the defendant given his pending trial; (2) defense counsel can request legal calls through the normal protocols and MDC will prioritize the defendant given his pending trial; and (3) MDC received the Jencks Act materials provided by the Government and will ensure the defendant has access to them on his laptop in his cell while he is in quarantine. In addition, defense counsel respectfully requests that the Court inquire as to whether a suitable room in the Courthouse is available (*i.e.*, a room where appropriate distancing is possible) for meetings between the defendant and defense counsel.

Second, the Government understands that the criminal trials scheduled to select a jury on March 1, 2022 have resolved (or are scheduled to soon resolve). The parties are available to start trial on that date. To the extent the date is not feasible for the Court, the Government will update the Court as soon as it learns of other available dates.

Respectfully submitted,

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United States Attorney

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cc: Defense Counsel (by ECF)